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*ADMITTED IN NY & NJ

May 3, 2024

BY FEDEX and ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application to file exhibits under
seal is provisionally granted.
SO ORDERED.
5/3/2024


P. Kevin Castel
United States District Judge

Re: United States v. Da Costa, 23 CR 610 (PKC)
Wilson Daniel Freitas Da Costa - Defendant

Your Honor:

Enclosed please find a courtesy copy of Defendant Wilson Da Costa's Reply brief in further support of his Omnibus Motion along with a thumb drive containing accompanying Exhibits A through D.

I write to request that Exhibits A through D of our Reply brief may be filed under seal.

Each of these exhibits was obtained from the Government as part of Discovery. The exhibits were provided to defense counsel pursuant to a Protective Order which restricts the individuals who are permitted to view the contents of the documents. As a result, the public filing of our Reply will result in the dissemination of Discovery material beyond the bounds of the Protective Order.

In the Indictment, the Government has deliberately avoided identifying the corporations described as "Company-1" and "Company-2." The Government has also avoided identifying individuals affiliated with these companies. References to the identities of these companies and individuals appear in the exhibits filed in support of our Reply brief.

Conclusion

For all of the reasons set forth herein, we respectfully request that the Court permit us to file the Exhibits under seal.

Most respectfully,

/s/ Maurice H. Sercarz

cc: All Parties (by ECF)